

**DOCKETED**

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## **Golden State Registry and iPermit Conflict of Interest**

*Additional submitted attachment is included below.*

**From:** [Richard Barlow](#)  
**To:** [Energy - Docket Optical System](#)  
**Cc:** [Raymond Hernandez](#)  
**Subject:** Subject: 22-HERS-01: Golden State Registry and iPermit Conflict of Interest  
**Date:** Wednesday, February 19, 2025 2:42:58 PM

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Dear CEC,

I have proudly served in California's HERS rating industry for over a decade, and I now co-lead Absolute Efficiency Group—a company dedicated to providing HERS Rating and Consulting services for New Construction, Residential Alterations, and Multi-Family projects, with a special focus on supporting disadvantaged individuals and economically challenged areas.

If I can first say thank you to Mr. Bowers on behalf of AEG for sending his docket out in regards to Golden State Registry and iPermit Conflict of Interest. I had no idea of the relationship of all parties mentioned and I would like more detail as most of the presumed individuals do not wish to share this information to the public and the CEC for additional review. As a long time rater and part owner of a company which started from the ground up, I do feel that other rating organizations have the right to be included in some of the many changes that we see moving forward. This industry should not be undermined nor should we be misinformed by being told everything is considered "confidential" or is an "invasion of privacy".

While I firmly believe that healthy competition drives excellence and innovation, I have serious concerns when it comes to a scenario where iPermit and ARCXIS have such close ties to a group who would be responsible for their quality assurance oversight. How am I supposed to compete with that?

The CEC needs to establish clear conflict of interest rules between iPermit, ARCXIS, and GSR, and these rules must be open for public review and comment. Otherwise, what's the point of all the effort put into ECC rule development over the past few years?

Sincerely,

Richard Barlow

President, Absolute Efficiency Group



### Absolute Efficiency Group

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